

January 30, 2017

Federal Election Commission
Attn: Neven F. Stipanovic
Acting Assistant General Counsel
999 E Street, NW
Washington, DC 20463

Re: Comments on Notice 2016-10 (Rulemaking Petition: Implementing the Consolidated and Further Continuing Appropriations Act, 2015)

Dear Mr. Stipanovic,

The following comments on Notice 2016-10 are submitted by the undersigned counsel on behalf of the NRSC (National Republican Senatorial Committee) and NRCC (National Republican Congressional Committee).

The referenced Rulemaking Petition addresses two recent changes in the law. First, the Gabriella Miller Kids First Research Act eliminates public funding for presidential nominating conventions. We agree with the Petitioner that the Commission should update its regulations to reflect the Gabriella Miller Kids First Research Act. We support the Petitioner's suggestion that obsolete provisions in 11 C.F.R. Part 9008 be removed from the Commission's regulations.

Second, the Consolidated and Further Continuing Appropriations Act, 2015, authorizes national party committees to maintain three new types of accounts and raise funds for those accounts under separate contribution limits. These provisions apply to the six major party national committees (the Republican National Committee, the Democratic National Committee, the National Republican Senatorial Committee, the Democratic Senatorial Campaign Committee, the National Republican Congressional Committee, and the Democratic Congressional Campaign Committee), and a very small number of minor party counterparts. The Appropriations Act did not introduce any new concepts to the law, and the national party committees have extensive experience with convention funding, building and legal funds. We see little reason to undertake a comprehensive, time- and resource-consuming rulemaking that will, for all practical purposes, apply to six committees, all of which are serviced by experienced counsel. Rather, the Commission's limited time and resources should be devoted to activities that more broadly serve the general public.

As the Petition for Rulemaking itself demonstrates, the current state of the law reflects decades of precedent and practice. To the extent that questions remain or arise, those questions may be resolved more efficiently through the advisory opinion process.

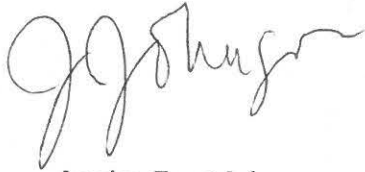
If, however, a rulemaking is pursued we encourage the Commission to revise its regulations to reflect the 2015 Appropriations Act by incorporating the statutory language

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verbatim to the greatest extent possible. It is unnecessary at this time to attempt to restate and codify the Appropriation's Act "legislative history, structure and purpose." Petition for Rulemaking at 2.

Thank you for your consideration.



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Sincerely,



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